

LOWENSTEIN SANDLER PC

Kenneth A. Rosen, Esq. (KR 4963)
S. Jason Teele, Esq. (SJT 7390)
Thomas A. Pitta, Esq. (TP 3018)
Timothy R. Wheeler, Esq. (TW 3466)
Wojciech F. Jung, Esq. (WJ 2047)
65 Livingston Avenue
Roseland, New Jersey 07068
Tel: (973) 597-2500
Fax: (973) 597-2400

Proposed Counsel to the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

EPV SOLAR, INC.,

Debtor.

Chapter 11

Case No. 10-15173 ()

APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

On the date hereof (the "Petition Date"), EPV Solar, Inc., the above-captioned debtor and debtor in possession (the "Debtor"), filed a petition for relief under chapter 11 of title 11 of the United States Code.

Counsel for the Debtor requests that the following relief be provided on a first day basis (check those that apply):

1. ☒ DEBTOR'S MOTION FOR INTERIM AND FINAL ORDERS UNDER SECTION 105, 361, 362 AND 363 OF THE BANKRUPTCY CODE APPROVING THE USE OF CASH COLLATERAL, PROVIDING ADEQUATE PROTECTION AND SETTING A FINAL HEARING PURSUANT TO BANKRUPTCY RULE 4001 [DOCKET NO. 3]
2. ☒ DEBTOR'S MOTION FOR ORDER PURSUANT TO 11 U.S.C. §§ 105(a), 507(a)(4) AND 507(a)(5) (I) AUTHORIZING THE DEBTOR TO PAY PRE-PETITION WAGES AND SALARIES AND HONOR CERTAIN EMPLOYEE BENEFITS, (II) DIRECTING ALL BANKS TO HONOR PRE-PETITION

CHECKS FOR PAYMENT OF PRE-PETITION EMPLOYEE OBLIGATIONS, AND (III) AUTHORIZING THE DEBTOR TO HONOR WORKERS' COMPENSATION OBLIGATION [DOCKET NO. 4]

3. ✓ DEBTOR'S MOTION FOR ENTRY OF AN INTERIM ORDER AND A FINAL ORDER (I) PROHIBITING UTILITY COMPANIES FROM DISCONTINUING, ALTERING OR REFUSING SERVICE ON ACCOUNT OF PREPETITION INVOICES, (II) DEEMING UTILITY COMPANIES TO HAVE ADEQUATE ASSURANCE OF FUTURE PAYMENT, AND (III) ESTABLISHING PROCEDURES FOR RESOLVING REQUESTS FOR ADDITIONAL ASSURANCE PURSUANT TO 11 U.S.C. §§ 105(a) AND 366 [DOCKET NO. 5]
4. ✓ DEBTOR'S MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 105(a), 363(c), 345(b) AND 1107 (I) AUTHORIZING THE DEBTOR TO CONTINUE AND MAINTAIN ITS EXISTING CASH MANAGEMENT SYSTEM, BANK ACCOUNTS AND BUSINESS FORMS, (II) MODIFYING THE INVESTMENT GUIDELINES SET FORTH IN 11 U.S.C. § 345, AND (III) GRANTING RELATED RELIEF [DOCKET NO.6]

Respectfully submitted,

LOWENSTEIN SANDLER PC

/s/ S. Jason Teele

Kenneth A. Rosen, Esq. (KR 4963)

S. Jason Teele, Esq. (SJT 7390)

Thomas A. Pitta, Esq. (TP 3018)

Timothy R. Wheeler, Esq. (TW 3466)

Wojciech F. Jung, Esq. (WJ 2047)

65 Livingston Avenue

Roseland, New Jersey 07068

Tel: (973) 597-2500

Fax: (973) 597-2400

Proposed Counsel to the Debtor and Debtor in Possession

Dated: February 24, 2010
Roseland, New Jersey